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**MEMO ENDORSED**

May 5, 2022

**Via ECF Electronic Filing**

The Honorable Valerie Caproni  
USDC, Southern District of New York  
40 Foley Square  
New York, NY 10007

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Re: *Kilpatrick v. Amtrak*  
USDC, SDNY, No. 1:20-cv-05870; P/O File No. 20-1048

Dear Judge Caproni,

Pursuant to your Individual Practices in Civil Cases (1)(C), *Requests for Adjournments or Extensions of Time*, Plaintiff respectfully requests a brief continuance of the current deadline for fact discovery in this matter to complete one remaining deposition in the matter. As outlined in your Individual Practices, we submit the following:

Under the updated Scheduling Order, all fact discovery must be completed by May 4, 2022, with a Pre-trial conference on June 17, 2022 (R. Doc. 27). All expert discovery, including reports, production of underlying documents and depositions, is scheduled to be completed by June 15, 2022.

Plaintiff requests a brief extension of the discovery deadline to complete the deposition of Ms. Francis Williams. The deposition of Ms. Williams was scheduled for May 3, 2022. However, undersigned counsel had an uncurable conflict and requested additional deposition dates from Amtrak's counsel. Amtrak's counsel is currently procuring additional dates. Further, Amtrak is supplementing discovery with documents requested by Plaintiff's counsel for Ms. Williams' deposition. Amtrak does not have an objection to this brief extension.

Plaintiff is requesting a brief fact discovery continuance until the date of the mediation in this case, June 3, 2022, to complete the deposition of Ms. Williams. Please let me know if there is any further information that you require.

Thank you for your time and attention to this matter, and with kind regards, I remain

Very truly yours,

Carisa German-Oden

CGO/klw

cc: Mina Miawad

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written in a cursive style.

Date: 5/9/2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE